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Atorneys for Defendants  
SONY NETWORK ENTERTAINMENT AMERICA, INC. and  
SONY COMPUTER ENTERTAINMENT AMERICA LLC

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

CHRISTOPHER W. MCKEWON and  
CHRISTOPHER WILSON, individually and on  
behalf of all others similarly situated,

**Plaintiff,**

V.

SONY NETWORK ENTERTAINMENT  
AMERICA, INC., a Delaware Corporation;  
SONY COMPUTER ENTERTAINMENT  
AMERICA LLC, a Delaware Limited Liability  
Company.

### Defendants.

Case No. 3:11-cv-02177-MEJ

**STIPULATION TO EXTEND  
TIME FOR DEFENDANTS TO  
MOVE, ANSWER, OR  
OTHERWISE RESPOND TO  
COMPLAINT**

Judge: Magistrate Judge Maria-Elena James

1           WHEREAS, defendants Sony Network Entertainment America, Inc. (“SNEA”) and Sony  
2 Computer Entertainment America LLC (“SCEA”), as well as certain related entities (collectively,  
3 the “Sony Defendants”), have been named as defendants in at least twenty-one (21) putative class  
4 action lawsuits within this District, to date (collectively, the “N.D. Cal. Sony Litigations”);

5           WHEREAS, certain of the Sony Defendants have also been named as defendants in at  
6 least eighteen (18) putative class action lawsuits pending outside this District, to date, including at  
7 least six (6) suits in the Central District of California, one (1) suit in the Southern District of  
8 California, one (1) suit in the Southern District of New York, two (2) suits in the Eastern District  
9 of New York, one (1) suit in the District of Massachusetts, one (1) suit in the Eastern District of  
10 Michigan, two (2) suits in the Southern District of Texas, one (1) suit in the District of  
11 Connecticut, one (1) suit in the District of New Jersey, one (1) suit in the Northern District of  
12 Ohio, and one (1) suit in the Southern District of Florida (collectively, with the N.D. Cal. Sony  
13 Litigations, the “U.S. Sony Litigations”);

14           WHEREAS, a motion is currently pending before the Judicial Panel on Multidistrict  
15 Litigation (the “JPML”) to centralize this and other matters, to which one response has been filed  
16 to date, and as to which other responses, including the Sony Defendants’ response, are due by  
17 June 2, 2011.

18           WHEREAS, the current deadline for SNEA and SCEA to respond to the Complaint in the  
19 above-entitled action is May 26, 2011;

20           WHEREAS, the parties have agreed to the extension of time herein for the defendants in  
21 the above-captioned action to move, answer, or otherwise respond to the Complaint, in order to  
22 facilitate the scheduling of this matter in coordination with the schedule for the motion before the  
23 JPML;

24           NOW, THEREFORE, pursuant to Civil Local Rules 6-1(a), 7-1(a), and 7-12, all parties,  
25 by and through their respective counsel, hereby stipulate as follows:

26           The deadline for the defendants to respond to the Complaint in the above-captioned action  
27 is extended until and including 30 days after a consolidated complaint is filed in a multidistrict  
28

1 litigation centralizing the above-captioned action with other matters, or if centralization is denied  
2 by the JPML, then 30 days from the date of such order denying centralization.

3 Dated: May 17, 2011

4 FRANCIS M. GREGOREK  
5 BETSY C. MANIFOLD  
WOLF HALDENSTEIN ADLER FREEMAN &  
HERZ LLP

6

7 By: /s/ Betsy C. Manifold /s/ [as authorized]  
8 Betsy C. Manifold

9 Attorneys for Plaintiffs  
10 CHRISTOPHER W. MCKEOWON  
CHRISTOPHER WILSON

11 Dated: May 17, 2011

12 HARVEY WOLKOFF  
THAD A. DAVIS  
ROCKY C. TSAI  
13 ROPES & GRAY LLP

14

15 By: /s/ Rocky C. Tsai /s/  
Rocky C. Tsai

16 Attorneys for Defendants  
17 SONY NETWORK ENTERTAINMENT  
AMERICA, INC. AND SONY  
18 COMPUTER ENTERTAINMENT  
AMERICA LLC

19

**[PROPOSED] ORDER**

20 PURSUANT TO STIPULATION, IT IS SO ORDERED.

21

22 Dated: May 18, 2011

23 By: U. S. District Court Magistrate Judge

